NPDES
Inspection Report

Sierra Pacific Industries
(NPDES Permit #: WAR007765)

Burlington, Washington

September 4, 2015 and September 14, 2015

Prepared by:

Sandra Brozusky
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Rob Hamar, Curt Adcock, Tony Jaegel from observations during the inspection.)

I. Facility Information

Facility Name: Sierra Pacific Industries (facility)
(Note that according to Washington Department of Ecology's Permit and Reporting Information System (PARIS), the facility name is Burlington Lumber Facility. At the time of inspection, facility representatives identified the facility as Sierra Pacific Industries.)

Owner and Operator: Sierra Pacific Industries

Facility Contact(s):

Name	Title	Phone Number	Email Address
Rod Hamar	Safety Coordinator	(360) 424-7619	rhamar@spi-ind.com
Curt Adcock	Washington Operation Manager	(360) 424-7619	cadcock@spi-ind.com
Tony Jaegel	Director Environmental Affairs	(503) 378-8179	tjaegel@spi-ind.com
Brad Gould	Plant Manager	Cell: (530) 440-4991	bgould@spi-ind.com

Physical/Mailing Address: 14353 McFarland Road
Mount Vernon, Washington 98273

GPS Coordinates: +48.447108333°/-122.43450277°
(Obtained from Google Earth Pro)

Receiving Water: Indian Slough

Permit #: WAR007765

Number of Employees: 180 at this plant; approximately 4500 company-wide

Length of Operation: The facility began operating at this location in late 2006.

Facility Size: The mill site is approximately 54 acres however the facility

owns about 140 total acres encompassing the property.

Annual Revenue: Not obtained at the time of inspection

Additional Properties: According to Mr. Adcock, this facility is one of three operating mill plants in Washington State. A new mill located in Shelton, WA will be the fourth plant. Sierra Pacific Industries also has mill operations located in California.

II. Inspection Information

Inspection Date	September 4, 2015	September 14, 2015
Time Arrived	11:05 AM	9:25 AM
Time Departed	1:30 PM	1:50 PM
Weather Condition	Clear and dry	Clear and dry
Facility Representatives Present	Rod Hamar Curt Adcock	Rod Hamar Curt Adcock Brad Gould Tony Jaegel Collin Emmerson, Safety Environmental Coordinator for a facility-owned plant in Shelton, WA
EPA Inspectors Present	Sandra Brozusky (Lead Inspector) and Joe Roberto	
Observed Discharge	I did not observe any stormwater discharge on either day.	

III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Washington Industrial Stormwater General Permit (ISGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas of the site, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

We did not collect samples at the time of this inspection.

IV. Inspection Entry

Specifics regarding entry at this facility are as follows:

- This was an unannounced inspection.
- I presented my credentials to Mr. Rod Hamar and Mr. Curt Adcock upon arriving at the facility.
- I explained to Mr. Hamar that this visit was a compliance inspection to determine compliance with the ISGP and the Clean Water Act.
- Mr. Hamar and Mr. Adcock did not deny us access to the facility.
- Mr. Hamar and Mr. Adcock accompanied me throughout the inspection.
- We were allowed to inspect all areas of the facility that we wished to inspect.

Upon arriving at the facility on September 4, 2015 Mr. Hamar stated that he was responsible for implementing many elements of the ISGP. He also stated that he had to depart the facility at 2:00 PM the same day. In order to complete the inspection, the inspection team agreed to accomplish what we could in the allotted time on September 4th and return to the facility at another date. The inspection team returned to the facility on September 14, 2015 and completed the inspection.

V. Compliance History

Date of Last Inspection:	Based on a conversation with Kurt Baumgarten (WA Ecology) this facility has not been inspection in the past five years.
Enforcement Actions:	Available records indicate that this facility has not been issued any penalty or compliance orders for purposes of compliance with the ISGP.

VI. Facility Description/Background

In general, Sierra Pacific Industries is a small log dimensional sawmill plant. The primary wood species used at this plant include Douglas Fir and Hemlock.

This facility consists mainly of a building (which houses mill manufacturing operations), log decks (which according to the facility's stormwater pollution prevention plan includes four 1,100-foot long decks), steam kilns, a truck shop, rail lines for transporting finished product and a stormwater detention pond.

The bulk of the processing activity at this facility occurs indoors within the building mentioned above. These indoor activities are not exposed to precipitation and as a result do not impact stormwater.

The parts of this facility where industrial activities occur that are exposed to precipitation include the activities in the vicinity of the log deck on the north side of the facility and the chip bin loading area on the north side of the facility. See Attachment A for an aerial overview of the facility.

See the facility's stormwater pollution prevention plan in Attachment E for details regarding the main components at this facility and additional industrial activities with a potential to impact stormwater.

VII. Permit Information

At the time of the inspection, the facility was covered under the Washington ISGP (Permit #WAR0007765). According to information available in the PARIS database, Sierra Pacific Industries has been covered under a Washington ISGP since the previous permit, issued January 1, 2010.

See Attachment C for a copy of the permit coverage letter dated December 3, 2014. The December 3, 2014 letter indicates that the facility obtained coverage for the ISGP that became effective on January 2, 2015.

VIII. Permit Applicability and Requirements

The facility's NOI for coverage under the ISGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 2421 (Sawmills and Planing Mills, General). According to Condition S1 of the ISGP, facilities that fall under SIC code 2421 are eligible for permit coverage under the ISGP. See Attachment D for a copy of the NOI submitted by this facility for coverage under the ISGP.

Coverage under the ISGP means that this facility is responsible for complying with ISGP requirements including the following:

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to cover stormwater related activities at the facility as established in Condition S3.A.1 of the ISGP.

- Conduct and document visual facility inspections as established in Condition S7.A.1 of the ISGP. These inspections must be conducted monthly.

- Conduct quarterly benchmark monitoring for turbidity, pH, oil sheen, copper, and zinc as established in Condition S4 and Table 2 of the ISGP.

- Conduct quarterly benchmark monitoring for COD and TSS as established in Table 3 of the ISGP.

- Prepare and submit discharge monitoring reports (DMRs) which document the

results of quarterly benchmark monitoring as established in Condition S9.A of the ISGP.

- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Condition S8 of the ISGP.

- Prepare and submit an annual report to Ecology that documents the corrective actions conducted during the calendar year as established in Condition S8.B of the ISGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IX. Facility Tour

During the facility tour we examined all areas occupied by this facility including the chip bin loading area, the log decks, storm drains, stormwater outfalls, and the stormwater detention pond.

X. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit –** At the time of the inspection, Mr. Hamar produced a copy of the latest version (effective January 2, 2015) of the permit.

- **Discharge Monitoring Reports (DMRs) –** At the time of the inspection, I requested to see DMRs prepared for the facility for the past five years. Mr. Hamar produced all requested DMRs at the time of the inspection, with exception of four missing DMRs. These included the 4th quarter 2011, 2nd quarter 2013, 3rd quarter 2014 and 1st quarter 2015. Following the inspection, Mr. Hamar provided DMRs for the 2nd quarter 2013 and 3rd quarter 2014 via email.

- **SWPPP –** At the time of the inspection, I asked Mr. Hamar to provide a copy of the latest SWPPP. Mr. Hamar provided a written SWPPP with an original creation date of September 2006 and a 4th revision in 2014.

- **Monthly Visual Inspection Reports –** At the time of the inspection, I asked Mr. Hamar to produce all monthly visual inspection reports prepared for the facility for the past five years. Mr. Hamar produced all requested monthly visual inspection reports.

Note that the review of the above documents was not a comprehensive review designed

to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the "Areas of Concern" section of this report.

XI. Stormwater Generation, Treatment and Discharge

The operation of this facility is such that the bulk of the discharge from this facility is stormwater resulting from precipitation falling within the footprint of the facility. This facility is set up such that there are two drainage areas that route stormwater to two separate outfalls. The facility does maintain a truck wash with a discharge into the sanitary sewer system. See Attachments E and F for the stormwater pollution prevention plan and a facility map that identifies the discharge locations and associated drainage areas.

The primary drainage area drains almost the entire facility. Drainage from the facility is routed north to a stormwater detention pond. Stormwater entering this pond then flows directly south via an underground pipeline to Indian Slough at discharge point DP1. See Attachment A and photograph 6 in Attachment B of this report for a detailed view of DP1.

The second drainage area at this facility is for a small section of McFarland Road at the south side of the facility. This is the main entrance road to the facility that maintains truck, forklift and employee vehicle traffic. This drainage area collects stormwater runoff from a portion of McFarland Road and routes this drainage to Indian Slough at discharge point DP2. See photograph 5 in Attachment B of this report for a detailed view of DP2.

At the time of inspection, facility representatives described a drainage ditch located on the north side of the facility that travels from east to west. See Attachment A for the location and direction of this ditch. According to facility representatives this drainage ditch, identified as "drainage ditch 19" enters the facility property from the northeast. Once it enters the property it initially flows in a westerly direction. Drainage ditch 19 then travels from the north to the south side of the property via an underground hard-piped drain and discharges into Indian Slough.

As a result the drainage being hard-piped through the facility, pollutants from within the footprint of the facility cannot enter drainage ditch 19. However, the drainage area for McFarland Road is directed into and comingles with drainage ditch 19, before discharging into Indian Slough. Discharge point DP2 is the point at which comingled drainage from McFarland Road and drainage ditch 19 enter into Indian Slough. See the "Areas of Concern" section of this report for further details on DP2.

According to facility representatives, major best management practices incorporated at this facility include:

- Daily sweeping and other good housekeeping practices

- The use of the stormwater detention pond

See Attachment E for a copy of the facility's SWPPP which identifies additional best management practices.

XII. Receiving Water

According to Mr. Hamar, the facility discharges into Indian Slough. Indian Slough runs along the south side of the facility. See Attachment A of this report for details regarding the location of Indian Slough.

XIII. Areas of Concern

At the time of the inspection I identified several areas of concern. Specifically, the concerns at this facility are identified as follows:

A. <u>Zinc Reporting on DMR</u>

Condition S9.A.1 of the Washington ISGP states that "The permittee shall submit sampling data obtained during each reporting period on a Discharge Monitoring Report…"

Condition G2.B of the Washington ISGP states that "All reports required by this permit and other information requested by Ecology shall be signed…"

In addition, Condition G2.D of the Washington ISGP states that "Any person signing a document under this section shall make the following certification: I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete…"

At the time of the inspection, I obtained a copy of the DMR for the 2nd quarter of 2012. This DMR information included supporting laboratory documentation. Review of this information indicates that zinc values were reported inaccurately in the 2nd quarter 2012 DMR.

Specifically, review of the supporting laboratory documentation indicates that the zinc sample results were reported by the laboratory in units of mg/l. In addition, review of the DMR indicates that the same numeric values reported in the supporting laboratory documentation was also reported in the DMR, however, the units used in the DMR was ug/l. This result in the DMR underestimated the

actual zinc concentrations being discharged by the facility.

For example, the laboratory documentation for the sample collected for the 2nd quarter of 2012 reported zinc values of 0.057 mg/l and 1.463 mg/l for outfalls DP1 and DP2, respectively. However, the zinc values reported in the DMR were 0.057 ug/l and 1.463 ug/l, respectively. This means that the lab results (including results for copper) were not translated properly into the DMR. It also means that the zinc values reported in the DMR are actually 1000 times lower than the values that should have been reported.

The concern is that the zinc values reported in the DMR do not accurately reflect what is being discharged by the facility. In addition, there could be a situation where the discharged wastewater could be exceeding the benchmark value for zinc and the DMR would not reflect that result.

Note that a detailed evaluation of the reporting of zinc values was only conducted on results reported in the 2nd quarter 2012 DMR. This evaluation was not conducted on any other DMR from the facility.

See Attachment G for the 2nd quarter of 2012 DMR and associated analytical results.

B. Level One Corrective Action for Zinc

Condition S8.B of the Washington ISGP states that "Permittees that exceed any applicable benchmark value(s) in Table 2, Table 3 and/or Table 7 for any quarter shall complete a Level 1 Corrective Action for each parameter exceeded…" As part of the corrective action, the permittee must "Summarize the Level 1 Corrective Actions in the Annual Report…" as required by Condition S8.B.2 of the Washington ISGP.

The facility exceeded the benchmark value for zinc in the 2nd quarter of 2012. The facility did not conduct a level 1 corrective action as required under condition S8 of the ISGP. Note, however, that the facility was unaware they triggered a level 1 corrective action because it was unknown that the zinc benchmark was exceeded.

Due to time constraints, not all DMRs were compared to associated analytical results. It is unknown if actual zinc values for other quarters exceeded benchmark values, triggering corrective action(s).

C. Missing DMRs

Condition S9.A.1 of the Washington ISGP states that "The Permittee shall submit sampling data obtained during each reporting period on a Discharge Monitoring Report …" The reporting period is quarterly as established in Condition S9.A.2 of the ISGP.

Condition S9.A.4 of the Washington ISGP states that "The Permittee shall submit a DMR each reporting period, whether or not the facility has discharged stormwater from the site."

In addition, Part S9.C.1.j of the Washington ISGP specifies that the Permittee shall retain documents onsite, including reports required by the permit (DMRs), for a minimum of five years.

At the time of the inspection, I asked Mr. Hamar to produce DMRs generated for this facility for the past five years. As mentioned earlier in this report, specific DMRs were missing at the time of inspection. Subsequent to the inspection, Mr. Hamar provided a few of the missing DMRs, however the 4th quarter of 2011 and 1st quarter of 2015 were not included in this follow-up. See Attachment H for the DMRs provided subsequent to the inspection.

D. <u>pH Holding Time</u>

Table 2 under condition S5 of the Washington ISGP lists benchmarks required to be analyzed by all permitted facilities, including pH.

Condition S4.C of the Washington ISGP states that "The Permittee shall ensure that analytical methods used to meet the sampling requirements in this permit conform to the latest revision of the Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in *40 CFR* Part 136, unless specified otherwise in this permit."

40 CFR 136.3 Table II lists various parameters and associated maximum holding times. Included in this table is pH, which has a maximum holding of 15 minutes.

At the time of inspection, I asked Mr. Hamar how the facility conducted sampling and if any parameters were measured at the facility. Mr. Hamar indicated that pH and turbidity were measured at the facility but were also measured by the laboratory. For DMR purposes, Mr. Hamar would report analytical results from the laboratory, not from field measurements.

The inspection team mentioned that pH has holding time of 15 minutes, which would likely be exceeded by the time the laboratory conducted analysis. Mr. Hamar stated that he had been conducting and recording the field analysis for pH but was not including this result in the DMRs.

Mr. Hamar also stated that he recalled only a minor difference between what he measured in the field and what the laboratory results reported. Subsequent to the inspection, Mr. Hamar provided a list to compare the pH field analysis with laboratory results. This is included in Attachment H of this report.

E. BMPs for Chip Loading Area

Condition S3.B.4.b.ii.2 of the ISGP states that "The SWPPP shall include BMPs to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain… Permittees shall: a) Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas…"

At the time of the inspection, we conducted a field tour including the chip loading area on the north side of the facility. See Attachment A for the location of this area. This chip loading area is located adjacent to drainage ditch 19, which discharges into Indian Slough. At this time, I saw chip debris scattered on the ground, adjacent to drainage ditch 19. See photographs 3 and 4 in Attachment B for views of this area. This area did contain silt fencing down gradient of the loading area and uphill of drainage ditch 19, however, this fencing was not maintained as it was pushed down by the debris.

Following the inspection, Mr. Hamar provided photographs of additional barriers installed between the chip loading area and drainage ditch 19 to prevent debris from entering the ditch. See Attachment H for these photographs provided by the facility.

F. Representative Sample

Condition S4.B.1.d of the Washington ISGP states that "The Permittee shall obtain a representative sample …," and representative sample is defined in the ISGP as "a sample of the discharge that accurately characterizes stormwater runoff generated in the designated drainage of the facility."

According to Mr. Hamar, stormwater sample collection occurs at two discharge locations, DP-1 and DP-2. See Attachment A for the location of these discharges. As mentioned earlier in this report, DP-2 is the point at which water from drainage ditch 19 and stormwater runoff from a portion McFarland Road comingle and discharge into Indian Slough. Mr. Hamar indicated that when stormwater samples are collected at DP-2 the sample would be of this comingled water. This information indicates that the samples collected at this location do not solely reflect the impact of industrial activity occurring in the drainage area for DP-2.

See Attachment B photograph 5 for a view of DP-2.

G. Secondary Containment for Urea Storage

Condition S3.B.4.b.i.4.a of the Washington ISGP states that the Permittee shall, "Store all chemical liquids, fluids, and petroleum products, on an impervious

surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater."

At the time of the inspection, we conducted a facility tour including areas that had chemical storage. Located in the vicinity of the truck shop, was a container of what facility representatives identified as urea. At the time of inspection, this container did not have secondary containment.

Note that this area of concern was not mentioned during the closing conference of the inspection or subsequent to the inspection. See Attachment B photograph 1 for a view of the urea container.

XIV. Closing Conference

Prior to concluding the inspection, we held a closing conference with all representatives present for the inspection on September 14, 2015. The purpose of this closing conference was to discuss the preliminary findings of the inspection. The inspection team discussed the areas of concern listed above, with exception to area of concern G – secondary containment for urea storage. We then thanked the facility representatives for the time and assistance with the inspection.

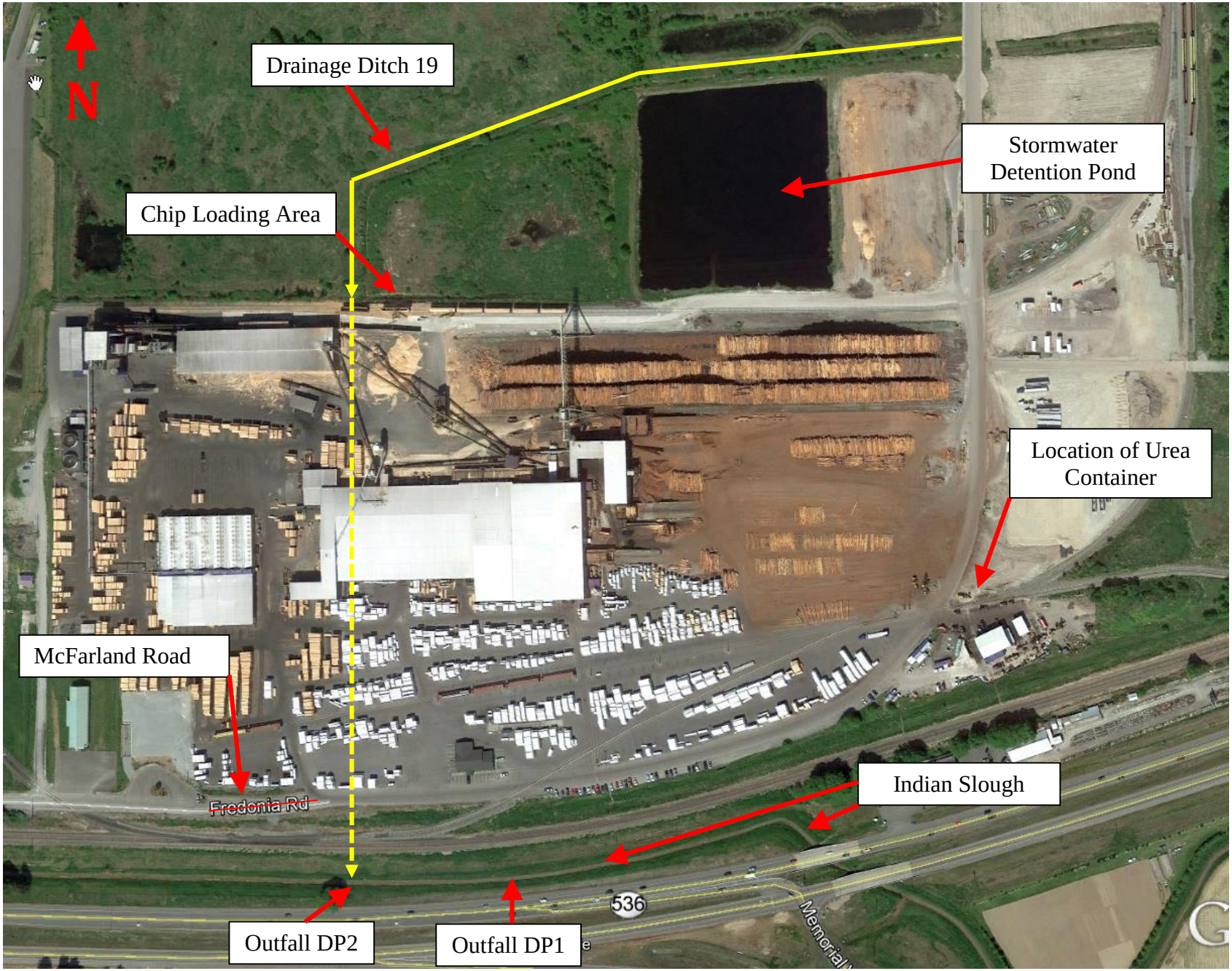
Report Completion Date: _____

Lead Inspector Signature: _____

Attachment A

Facility Aerial Image

Sierra Pacific Industries


N
Drainage Ditch 19
Stormwater Detention Pond
Chip Loading Area
Location of Urea Container
McFarland Road
Fredonia Rd
Indian Slough
536
Outfall DP2
Outfall DP1

Attachment B

Photograph Documentation

Sierra Pacific Industries

All photographs were taken by Joseph Roberto using a Samsung SL605

Photograph 1 (SAM_2090): View of the urea container (translucent white tank) without secondary containment. This container is located just north of the truck shop, in the southeast corner of the property.

Photograph 2 (SAM_2093): View of the stormwater detention pond located on the north side of the property. A majority of the stormwater from the property is routed to this pond. One inlet can be seen on the bottom right corner of the photograph, indicated by the red arrow.

Photograph 3 (SAM_2097): Overview of the chip loading area, located on the north side of the facility.

Photograph 4 (SAM_2098): View of the chip debris observed from chip loading activities. Drainage ditch 19 intersects this area at the approximate location of the persons wearing the orange safety vests in the background.

Photograph 5 (SAM_2103): View of the sample collection point at outfall DP2. This outfall drains stormwater from a portion of McFarland Road and the water collected in drainage ditch 19. At this point, stormwater from McFarland Road and water in drainage ditch 19 are comingled.

Photograph 6 (SAM_2104): View of the sample collection point at outfall DP1. This outfall drains stormwater routed to and collected in the stormwater detention pond. Indian Slough is seen here in the background.

Attachment C

Permit Coverage Letter

Sierra Pacific Industries

Attachment D

Notice of Intent

Sierra Pacific Industries

Attachment E

Stormwater Pollution Prevention Plan

Sierra Pacific Industries

Attachment F

Stormwater Pollution Prevention Plan Facility Map

Sierra Pacific Industries

Attachment G

DMR and Associated Analytical Data for 2nd Quarter 2012

Sierra Pacific Industries

Attachment H

Follow-up Information Regarding pH, the Chip Loading Area and Missing DMRs

Sierra Pacific Industries